

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JAIMARIA BODOR,  
individually and on behalf of all others  
similarly situated,

Plaintiff,

vs.

MAXIMUS FEDERAL SERVICES, INC.,  
Defendant.

CIVIL ACTION

NO. 5:19-cv-05787 (JMG)

**PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION FOR LEAVE  
TO FILE REPLY BRIEF IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT**

Plaintiff opposes Defendant's Motion for Leave to File a Reply in Support of its Motion for Summary Judgment (ECF 70). Defendant's proposed brief appended to its motion only underscores the material factual disputes between the parties, which preclude a grant of summary judgment.

If, however, the Court is inclined to grant Defendant's motion, Plaintiff respectfully requests leave to submit a surreply within seven (7) days of the Court's grant of Defendant's motion, which would afford Plaintiff the opportunity to address the factual errors introduced in Defendant's proposed reply, as well as errors introduced in Defendant's March 3<sup>rd</sup> response to Plaintiff's Statement of Facts.

Date: 3/4/2021

/s/ Jody T. López-Jacobs  
JODY T. LÓPEZ-JACOBS  
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**Attorney for Plaintiff**

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**CERTIFICATE OF SERVICE**

I, Jody T. Lopez-Jacobs, do hereby certify that a copy of the foregoing was served upon all counsel of record by CM/ECF electronic filing.

Date: 3/4/2021

/s/ Jody T. López-Jacobs

JODY T. LÓPEZ-JACOBS

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**Attorney for Plaintiff**